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Attorneys for Defendant Brock & Scott, PLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AZIZA EXOM, an individual,

Plaintiff,

vs.

BROCK & SCOTT, PLLC, a foreign
professional limited-liability company,

Defendant.

Case No: 2:24-cv-00773-APG-EJY

**STIPULATION AND ORDER TO
EXTEND WRITTEN DISCOVERY
DEADLINES
(FIRST REQUEST)**

The parties hereby stipulate and agree to permit Defendant additional time to respond to Plaintiff's written jurisdictional discovery. This stipulation is supported by good cause explained below and permitted by FRCP 29, FRCP 33, LR 26-3, and LR IA 6-1.

I. Introduction

This case commenced on April 23, 2024, with Plaintiff's Complaint. ECF 1. Defendant filed a Motion to Dismiss on June 28, 2024. ECF 8. Plaintiff filed her opposition on August 2, 2024. ECF 11. Defendant filed a Reply in Support of its Motion to Dismiss on August 8, 2024. ECF 12. The Motion to Dismiss is still pending as of today before Judge Andrew Gordon.

Defendant filed a Motion to Stay Discovery on August 20, 2024. ECF 14. Plaintiff filed a response to the Motion to Stay Discovery on August 30, 2024. ECF 15. Defendant filed a Reply in Support of its Motion to Stay Discovery on September 6, 2024. ECF 16.

1 On October 2, 2024, this Court issued an Order Granting in Part and Denying in Part
2 Defendant's Motion to Stay Discovery. ECF 17. This Court's Order permits Plaintiff to
3 conduct discovery solely related to the question of whether personal jurisdiction over
4 Defendant is proper for a period of 60 days from the date of the Order Granting in Part
5 and Denying in Part Defendant's Motion to Stay Discovery. This 60-day period is
6 presently set to end on December 2, 2024.

7 Plaintiff served Interrogatories and Requests for Production on Defendant on
8 October 4, 2024, and Defendant's responses were due on November 4, 2024. The
9 parties have agreed to allow Defendant a 10-day extension for responses to written
10 discovery to November 14, 2024.

11 **II. Good Cause Exists to Support this Stipulation.**

12 Attorney Damon Ellis, Esq., acts in a general counsel role for Defendant and he is
13 the individual responsible for collecting information and assisting in providing
14 Defendant's responses to Plaintiff's written discovery. Mr. Ellis works and resides in the
15 Tampa Bay, Florida region, which was recently impacted by both Hurricane Helene and
16 Hurricane Milton. These storms caused Mr. Ellis' office to be evacuated because of the
17 proximity to a flood zone. The building was closed and without power from October 7,
18 2024, to October 16, 2024. During this time, Mr. Ellis had no ability to review records or
19 gather information necessary to respond to the written discovery. For these reasons, the
20 parties have agreed that Defendant's responses to the written discovery will be due on or
21 before November 14, 2024.

22 **III. Proposed Discovery Deadlines**

23 Based on the agreement of the parties, the following proposed deadlines are
24 requested:

25 Defendants' responses to Plaintiff's written discovery: November 14, 2024

26 **IV. Conclusion**

27 Based on the foregoing, the parties respectfully request that this Court issue an
28 Order extending the time for Defendants to respond to Plaintiff's written discovery.

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1 IT IS SO STIPULATED.

2 Dated this 6th day of November, 2024.

3 LAW OFFICE OF KEVIN HERNANDEZ

LIPSON NEILSON P.C.

4 /s/ Kevin L. Hernandez

Joseph P. Garin

5 _____
6 Kevin L. Hernandez, Esq.
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10 *Attorney for Plaintiff*

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Las Vegas, NV 89144
Attorneys for Defendant

11 **ORDER**

12 IT IS SO ORDERED.

13
14 *Clayton J. Zouchak*
15 _____
16 U.S. MAGISTRATE JUDGE

17 Dated: November 6, 2024

18 Submitted by:

19 LIPSON NEILSON P.C.

20 *Joseph P. Garin*

21 _____
22 Joseph P. Garin, Esq.
23 NV Bar No. 6653
24 *Attorneys for Defendant*